# **Protest**

This chapter provides record formats to file, amend, and query 514 protests, 520(c) and 520(d) petitions and 181.115 interventions, as well as to receive automatic notification of their status from Customs.

#### INPUT RECORD DESCRIPTIONS

#### PJ - Initial Filing Transaction

A mandatory input protest header record that is used to contain the electronic signature required by CFR 174.12(6)(c) and may be used to request further review.
Record Identifier P11 (PJ) (Input)
Record Identifier P15 (PJ) (Input)
Record Identifier P16 (PJ) (Input)
Record Identifier P30 (PJ) (Input)
Record Identifier P31 (PJ) (Input)
Record Identifier P32 (PJ) (Input)
Record Identifier P40 (PJ) (Input)
Record Identifier P50 (PJ) (Input)
Record Identifier P60 (PJ) (Input)

Record Identifier P70 (PJ) (Input)PRO-28
A mandatory protest issue narrative input record used to concisely describe the protested decision/ issue.
Record Identifier P71 (PJ) (Input)PRO-29
A mandatory protest merchandise description input record that provides the commercial description of the merchandise affected by the decision as to which protest is made.
Record Identifier P90 (PJ) (Input)PRO-30
A mandatory protest narrative input record used to describe the nature and justification for the objection set forth distinctly and specifically with respect to a category, payment, claim, decision or refusal.
 Amendment Transaction
Record Identifier P10 (QJ) (Input)
Record Identifier P11 (QJ) (Input) PRO-32
A conditional input protest header record that is used to indicate that a sample and/or hardcopy materials are being forwarded to Customs to substantiate the claim, protest or intervention.
Record Identifier P16 (QJ (Input)
A conditional protest detail input record. This record applies only to 514 protests and is required only when
further review is requested using the P10 of the QJ amendment transaction
Record Identifier P30 (QJ) (Input)
A conditional protest identification input record that is used to correct protestant name and address information.
Record Identifier P31 (QJ) (Input)
A conditional protest address input record used only when the address portion of the protestant information is
to be corrected for foreign and other type protestants.
Record Identifier P32 (QJ) (Input)
A conditional protest address continuation input record used only if the protestant address begun in the P31 record requires two lines.
Record Identifier P40 (QJ) (Input)
An optional protest refund care/or (c/o) identification input record used to add or replace a refund care/or (c/o) party.
Record Identifier P50 (QJ (Input)
An optional protest substitute identification input record, which is used to identify a party, authorized by the protestant to receive notice of denial.
Record Identifier P60 (QJ) (Input)
An optional protest entry trailer input record used to withdraw an entry from a protest or 520 petition.
Record Identifier P90 (QJ) (Input)PRO-42
An optional protest narrative input record used to state any facts or additional legal arguments, not part of the existing protest record, upon which the protesting party relies, including the criterion set forth in CFR 174.24 which justifies further review.

PRO-33

**PRO-40** 

### **RJ - Addenda Transaction**

Record Identifier P10 (RJ) (Input)	
Record Identifier P11 (RJ) (Input)	
Record Identifier P40 (RJ) (Input)	
Record Identifier P50 (RJ) (Input)	
Record Identifier P60 (RJ) (Input)	
Record Identifier P90 (RJ) (Input)	
SJ - Service Request Transaction	
Record Identifier P10 (SJ) (Input)	on for further review (AFR) denial,
Record Identifier P90 (SJ) (Input)	
OUTPUT RECORDS	
SS - Inquiry/Notification Transaction	
Record Identifier P10 (SS) (Output)	lata to the ABI filer.
Record Identifier P11 (SS) (Output)	
Record Identifier P12 (SS) (Output)	regarding the processing status of

**PRO-51** 

PRO-53

Record Identifier P13 (SS) (Output)
Record Identifier P15 (SS) (Output)
Record Identifier P16 (SS) (Output)
Record Identifier P17 (SS) (Output)
Record Identifier P20 (SS) (Output)
Record Identifier P21 (SS) (Output)
Record Identifier P22 (SS) (Output)
Record Identifier P30 (SS) (Output)
Record Identifier P31 (SS) (Output)
Record Identifier P32 (SS) (Output)
Record Identifier P40 (SS) (Output)
Record Identifier P41 (SS) (Output)
Record Identifier P42 (SS) (Output)
Record Identifier P50 (SS) (Output)
A conditional output protest substitute party identification record that applies only to 514 protests, 520 petitions or 181.115 interventions. It is used to identify a party designated by the protestant to receive notice in case of denial of the protest.

Record Identifier P51 (SS) (Output)	
Record Identifier P52 (SS) (Output) PRO-78 A conditional output protest substitute party address continuation record used with the P50 and P51 records only if the substitute address requires two lines.	
Record Identifier P60 (SS) (Output) PRO-79 A conditional output protest entry trailer record used to transmit the number of any entry associated with the 520 petition, 514 protest or intervention.	
Decord Identifier D70 (SS) (Output)	
Record Identifier P70 (SS) (Output)	
Record Identifier P71 (SS) (Output)	
A conditional output protest merchandise description record used to transmit the commercial description of the merchandise affected by the decision as to which protest is made.	
Record Identifier P80 (SS) (Output)	
Record Identifier P90 (SS) (Output)	
Protest Response Messages	
Record Identifier P01 (Output)	
Record Identifier P99 (Output)	
PER Error Message (Output)	

# **Protest**

### Requirements

Any interested party may file protests electronically. That party must be currently ABI operational, or become ABI operational and be willing to develop or acquire the software necessary to input protests into and interact with the electronic protest programming which has been established within Customs Automated Commercial System (ACS).

Interested parties who are currently ABI operational will work with the same ACS client representative who now handles their account. They will merely send notice to Customs that they wish to file protests electronically.

Interested parties who are not currently ABI operational will need to follow normal procedures for becoming ABI operational. Companies that are not automated can submit data through a service bureau that provides the capability to communicate with the Customs Data Center, or acquire the software necessary to input and maintain protests themselves. In any instance, the interested party should file a letter of intent with Customs. The letter of intent is a written statement of a company's desire to participate in ACS/ABI. It must set forth a commitment to develop, maintain, and adhere to Customs performance requirements and operational standards. For information on the letter of intent, Communications, Data Transmission, and Software Development, refer to the *Requirements* chapter of this document.

**Business Rules and the System**: The ABI electronic protest system allows the user to file, amend, and make addenda and service requests. The business rules for use of the ABI applications follow the Customs Regulations. For protests, the filing period is anytime within 90-days after liquidation of the entry or the protested decision; for 520(c) petitions, one year from the date of liquidation; and for 520(d) petitions, one year from the date of importation. Interventions into 514 NAFTA protests can be filed anytime from the date of filing of the 514 protest up to the date of Customs decision of that 514 protest. The protest may be amended anytime within the filing period. After the close of the filing period and until Customs decision, addenda may be submitted. Accelerated disposition, review of AFR denial and voidance of denial may also be requested.

Electronic protests may be filed from any computer processing location of the protest filer. Customhouse brokers will still have to be licensed to transact business at the port where the protest is filed. (Licensing requirements do not apply to importers, consignees, ship's masters, vessel owners/ operators, surety companies and attorneys who may file protests on their own behalf or on behalf of another party.) Protests may also be filed using an ABI service center.

**Date of Filing**: The date of filing will be determined by the date of ABI the receipt of the protest or petition based on midnight eastern standard or daylight savings time.

Handling Hardcopy Materials and Samples: ABI protest filers may send samples and hardcopy materials to Customs in support of the 520, 514 or 181.115 intervention filed through ABI. Hardcopy materials do not include the Custom Form (CF) 19; rather, hardcopy is limited to those types of supporting materials which cannot be entered electronically in the arguments/ justification portion of the ABI records, (for example, blueprints, booklets, charts, diagrams, pamphlets, photographs). Both hardcopy materials and samples must be submitted directly to the Customs electronic filing (protest processing) port office. Local Customs port personnel will not be responsible for receiving or forwarding such materials to protest processing locations. The hardcopy materials and samples must be clearly marked with the Customs-assigned protest number with which they are associated. A reasonable time period of 5 business days is allowed for the filer to get the hardcopy and/or samples to the port. If hardcopy or samples are not received the protest or petition may be denied. Should additional time be required, the filer must contact the team currently assigned the protest and establish an extension period. Hardcopy materials may also be submitted in an electronic format agreeable to Customs.

**Substitutes**: The substitute party names on any 514 protest filed electronically must be ABI participants. This is required in an effort to maintain the paperless environment.

**Optional Designation for Refunds**: Refunds will be remitted to the importer/consignee directly, or in care of the party named in the filing.

**Event and Decision Notification**: ABI includes a notification routine that advises the ABI filer, and third party ABI filers linked to the protest or petition, of events as they occur in the processing cycle, culminating in final decision. The notification system is designed to support two types of notification: immediate and delayed. Currently, all notification will be immediate. The notification routine works on a periodic cycle. Every few minutes a search will be made of ABI protest notification records and notification will be transmitted for any Customs-initiated events which have occurred since the previous period. Notification events consist of:

- Protest Type Changed
- AFR Review Decision Posted
- Team Assignment Changed
- Voidance Decision Posted
- Hardcopy Received Date Posted
- Summons Posted
- Third Party ABI Filing
- Sample Received Date Posted

- OR&R Case Number Posted
- 181.115 Intervention Filed
- Refund Party Added/Corrected
- Internal Advice Number Posted
- Lead Protest Number Posted
- Test Case (Summons) Number Posted
- Protest Deemed Denied Posted
- AFR Decision Posted
- Protest Status Posted/Changed
- Process Status Code Posted/Changed

**Query Capabilities and Service Levels**: The ABI filer may check the status of any protest or petition they have filed at any time using the query capability. Customs will service two levels of queries: recap and full file.

The recap query allows the ABI filer to get a partial record consisting of: the current status and status date of the protest or petition; status of samples and hardcopy materials; team assignments; the status of requests for further review, review of denial of further review, denial of 514 protest be voided and accelerated disposition have been approved or denied.

The full file query allows the ABI filer to get the complete record, including the name and address of all the parties involved, entries, merchandise description, issue, and the nature and justification for the objection.

**Record Security**: The security of the records is based on the combination of the protest number and the filer reference number. Anyone knowing the correct combination can make ABI Amendment, Addenda and Service Requests for that protest and may also make recap or full file query requests.

When a third party filing occurs, the initial ABI filer is notified that the other party filing has occurred and the name of that third party is transmitted as part of the notification to the initial ABI filer. For example, if the protest was filed initially by the Customhouse broker and an amendment or additional argument is filed by an attorney, the Customhouse broker will be notified of the name of the attorney filing the amendment.

<b>Party Identities</b> : Protestants are defined a	<b>Party</b>	<b>Identities</b> :	<b>Protestants</b>	are	defined	as
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- Drawback Claimant
- Importer/Consignee
- Other
- Ship's Master
- Surety
- Vessel Owner/Operator

When a 181.115 intervention is filed, the foreign exporter/producer is used in the Protestant data field.

When a Customhouse broker is protesting on their own behalf, they are to identify themselves as Importer/Consignee.

The protestant type "Other" is used to identify any party at interest not specifically defined above. Such a party could be an airline passenger who wishes to protest a user fee.

Protest filers are defined as:

- Attorney At Law
- Customhouse Broker
- Drawback Claimant
- Foreign Exporter/Producer
- Importer/Consignee
- Other
- Ship's Master
- Surety
- Vessel Owner/Operator

The protest filer type "Other" will be used to identify any other party not specifically defined above. Such a party could be an airline passenger who paid a fee and files a User Fee protest.

**System Snow Days and Use of a FAX**: A FAX is not a method for transmitting hardcopy materials. A FAX is confined to use only in conjunction with a "snow day" situation for the ABI filer when the inability to transmit the protest or 520 petition to Customs electronically that day would coincide with the expiration of the 90-day protest filing or 1-year 520 petition filing period. When a system snow day and climax of the filing period coincide, the ABI filer may send Customs a FAX. The FAX must be equivalent to a complete CF-19 protest form or the letter requesting reliquidation under 520(c) or (d). The FAX transmission of the CF-19/letter will allow the filing period criteria to be met. When ABI interface capability is restored, the ABI filer must transmit the initial filing record set. When this is done, Customs will manually change the date of filing to agree with the date on which the FAX was received

**Limitations**: Any ruling issued by Customs Office of Regulations and Rulings (OR&R) will continue to be mailed to the protestant. This may be accomplished electronically as a future enhancement. Notification of the decision of the 514 protest (whether approved, denied, partly denied) will be transmitted to the ABI filer electronically by Customs.

Customs has the option to transmit to the ABI filer at the time of decision a brief statement of the reason for denial when the protest or petition is denied in whole or in part.

### **Initial Filing Transaction PJ**

ABI record identifiers comprise the initial filing PJ transaction. Together they are used to establish a new 520(c) or (d) petition, 514 protest or 181.115 intervention through ABI.

*Input*: Record Identifiers P10, P11, P15, P30, P70, P71 and P90 are mandatory records. Record Identifiers P16, P31 and P32 are conditional records. Record Identifiers P40, P50 and P60 are optional records.

Output: There are no output records.

The application identifier for Record Identifier B is PJ. For additional information on Record Identifier B, refer to the Application Control Chapter of this document.

### **Amendment Transaction QJ**

ABI record identifiers comprise the amendment QJ transaction. This transaction set is used to amend an existing 514 protest or 520(c) or (d) petition or 181.115 intervention via ABI. This transaction may be used after initial filing before expiration of the 90-day protest or 1-year 520 petition filing period expires. In the case of a 181.115 intervention, it can be used to indicate a sample or hardcopy

was sent, to correct protestant address information, and to send additional narrative. To submit a narrative statement of additional grounds or arguments in support of a valid 514 protest after the 90-day filing amendment period has expired, as explained in CFR 174.28, use the RJ Addenda transaction.

*Input*: Record Identifier P10 is a mandatory record. Record Identifiers P11, P16, P30, P31 and P32 are conditional records. Record Identifiers P40, P50, P60 and P90 are optional records.

*Output*: There are no output records.

The application identifier for Record Identifier B is QJ. For additional information on Record Identifier B, refer to the Application Control Chapter of this document.

#### Addenda Transaction RJ

The RJ transaction is used to file addenda or additional arguments for a protest or petition after the filing/amendment period has expired until disposition (Customs decision). In the case of a 181.115 intervention, it can be used to indicate that a sample or hardcopy has been sent and/or to transmit additional narrative until disposition of the 514 NAFTA protest.

*Input*: Record Identifier P10 is a mandatory record. Record Identifiers P11 and P90 and conditional records. Record Identifiers P40, P50 and P60 and optional records.

*Output:* There are no output records.

The application identifier for Record Identifier B is RJ. For additional information on Record Identifier B, refer to the Application Control Chapter of this document.

### **Service Request Transaction SJ**

ABI record identifiers comprise the service request SJ transaction. It is used when the filer's only purpose is to submit inquiry requests for any of the four categories of actions (520(c) or (d) petition, 514 protest, and 181.115 intervention). Either a recap or full file inquiry request can be submitted by this mechanism without waiting for a notification event to be initiated by Customs. It is also used to request accelerated disposition. It is also used to request other actions (which may be requested by the protestant after disposition of a 514 protest as provided by the Customs Modernization Act) such as requesting review of denial of further review and requesting denial of a 514 protest be voided. It can also be used to withdraw the petition, protest or intervention.

*Input:* Record Identifier P10 is a mandatory record. Record Identifier P90 is an optional record.

*Output:* There are no output records.

The application identifier for Record Identifier B is SJ. For additional information on Record Identifier B, refer to the Application Control Chapter of this document.

#### **Inquiry/Notification Transaction SS**

The SS transaction is used to respond to the ABI filer's query request. When a recap query is requested, only the complete P10, P11 and P12 records are transmitted by Customs to the ABI filer. When a full file query is requested, all records necessary to give the complete file are transmitted.

The SS transaction is also used to notify the ABI filer of various events that happen in Customs processing of the protest, petition, or intervention. When such an event happens, the ABI filer will be sent all necessary event records.

*Input:* There are no input records.

*Output:* Record Identifiers P10, P11 and P12 are mandatory records. Record Identifiers P15, P16, P17, P20, P21, P22, P30, P31, P32, P40, P41, P42, P50, P51, P52, P60, P70, P71, P80 and P90 are conditional records. Record Identifier P13 is an optional record.

The application identifier for Record Identifier B is SS. For additional information on Record Identifier B, refer to the Application Control Chapter of this document.

### **Protest Response Messages**

ABI record identifiers P01, P99 and PER comprise the Customs Response Messages for any protest transaction-initial filing, amendment, addendum or service request.

The P01 record is returned whenever a protest transmission is accepted error free.

The P99 record is returned each time a protest transmission is rejected with errors or accepted with warnings.

When a warning or error message is returned, the record invoking the warning or error will be followed by one PER record containing the three-character warning or error code and its definition.

*Input:* There are no input records.

Output: Record Identifiers P01, P99 and PER output records.

### Record Identifier P10 (PJ) (Input)

This is a mandatory input protest header input record which is used in the PJ initial filing transaction to contain the electronic signature required by CFR 174.12(6)(c) and may be used to request further review. The filer also uses this record to transmit to Customs a unique 12-digit reference number identifying the 520 petition, 514 protest or 181.115 intervention in this system.

Record Identifier P10 (PJ) (Input)								
Data Element	Length/ Class	Position	Status	Description	Note			
Control Identifier	1A	1	M	Must always equal P.				
Record Type	2N	2-3	M	Must always equal 10.				
Filler	12A	4-15	M	Space fill.				
Filer Reference Number	12X	16-27	M	Unique number assigned by the filer to the 520 petition, 514 protest or 181.115 intervention.				
Certification/ Signature	1A	28	M	A code of <i>X</i> that indicates an electronic signature. Represents the signature of the protestant or the party filing on behalf of the protestant.				
Inquiry Request Indicator	1A	29	O	A code indicating the type of inquiry:  1 = Status Recap requested 2 = Full file requested Blank = No inquiry requested.  This request will only be processed if the initial filing transmission is received error free.				
Application for Further Review	1A	30	О	A code of <i>R</i> indicating that further review is requested under CFR 174.23. If further review is not requested, transmit a space in this place. Only 514 protests are eligible for Further Review.				
Filler	50X	31-80	M	Space fill.				

### Record Identifier P11 (PJ) (Input)

This is a mandatory input protest header record which is used in the PJ initial filing transaction to indicate whether or not a sample or hardcopy material is being forwarded to Customs to substantiate the petition, protest or intervention. This record is also used to address the petition, protest or intervention to a team/office at the filing location.

Record Identifier H	Record Identifier P11 (PJ) (Input)							
Data Element	Length/ Class	Position	Status	Description	Note			
Control Identifier	1A	1	M	Must always equal P.				
Record Type	2N	2-3	M	Must always equal 11.				
Hardcopy Indicator	1A	4	М	A code indicating if a hardcopy was sent. Valid codes are:	1,2			
				S = Hardcopy materials sent by filer. N = No hardcopy materials.				
Filler	8A	5-12	M	Space fill.				
Sample Indicator	1A	13	М	A code indicating if a sample was sent. Valid codes are:	2			
				S = Sample submitted by filer. N = No sample.				
Filler	8A	14-21	M	Space fill.				
FAX Indicator	1A	22	М	A code indicating if a FAX was sent. Valid codes are:				
				S = Facsimile sent by filer. N = No facsimile.				
FAX Sent Date	8N	23-80	С	The date on which the facsimile was sent in CCYYMMDD format.	3			
Address Team	3X	31-33	M	A code representing the entry specialist or protest section team at the filing location which serves the filer's account. If not known, use 0PR.				
Filler	47X	34-80	M	Space fill.				

#### Note 1

Hardcopy materials do not include the CF-19. Rather, hardcopy is limited to those types of substantiating/supporting materials that cannot be entered electronically in the arguments/justification portion of the protest such as blueprints, booklets, charts, diagrams, pamphlets, and photographs. These might otherwise be called "exhibits."

#### Note 2

Samples and hardcopy materials must all be submitted directly to the electronic filing location DDPP. Local ports will not be responsible for receiving or forwarding such materials to protest processing locations.

#### Note 3

Facsimile is used only in conjunction with a "snow day" situation for the ABI filer when the inability to transmit the protest or 520 petition to Customs electronically that day would coincide with expiration of the 90-day protest filing or 1-year 520 petition filing period. When a system snow day and climax of the filing period coincide, the ABI filer may send Customs a facsimile. The facsimile must be equivalent to a complete CF-19 protest form or the letter requesting reliquidation under 520(c) or (d). The fax transmission of the CF-19/letter will allow the filing period criteria to be met. When interface capability is restored, the ABI filer must transmit the PJ initial filing record set. When this is done, Customs will manually change the date of filing to the date on which the facsimile was received.

### Record Identifier P15 (PJ) (Input)

This is a mandatory input protest detail record used in the PJ initial filing transaction to identify the type of action filed, to identify the Trade Compliance Process Owner with whom the submission is being filed, to cross reference the submission with other submissions, and to supply information establishing the protest filing and amendment period.

Record Identifier P	215 (PJ) (I	Input)			
Data Element	Length/ Class	Position	Status	Description	Note
Control Identifier	1A	1	M	Must always equal P.	
Record Type	2N	2-3	M	Must always equal 15.	
Filing DDPP	4N	4-7	M	District-port code where the decision is protested. Some ports other than those of the Trade Compliance Process Owner may be established by Customs as electronic protest filing locations. Contact your client representative for more information.	
Tariff Act Citation	1N	8	M	A code identifying the Tariff Act Citation. Valid codes are:  1 = Section 514 protest 2 = Section 520(c) petition 3 = Section 520(d) petition 4 = Section 181.115 Intervention	
Associated 520 Petition Number	12N	9-20	С	The Customs-assigned number identifying the previously denied 520(c) or (d) petition. Required when protesting denial of a 520(c) or 520(d) petition.	
Associated 514 Protest Number	12N	21-32	С	The Customs-assigned number identifying the 514 protest in which the foreign manufacturer/ producer is intervening. Required when filing a 181.115 intervention.	
Protest/Amendment Period Base Date	8N	33-40	С	Use format CCYYMMDD. Required under the following conditions: 1) when the entry is not liquidated or is not scheduled to liquidate; 2) when the type 1 (514) protest is NAFTA; or 3) when there is no entry (no P60 record). This date will be used to calculate the 90-day filing period for the 514 protest. Does not apply to 520(c) claims. Does not apply to 181.115 interventions. When the base date is used, the qualifier in position 41 must also be used.	

Record Identifier P15 (PJ) (Input)									
Data Element	Length/ Class	Position	Status	Description	Note				
Protest/Amendment Period Base Date Qualifier	1N	41	С	This qualifier is required when a protest/amendment period date is used. Does not apply to 181.115 interventions.  1 = Date of notification of decision adverse to the importer.  2 = Date of notification of adverse country of origin marking decision under NAFTA.  3 = Date of exaction.  4 = Date of notification of demand for payment against a bond in the case of a surety.					
Filler	39X	42-80	M	Space fill.					

### Record Identifier P16 (PJ) (Input)

This is a conditional protest detail input record. It applies to 514 protests only, not to 520 petitions or 181.115 interventions. It is required as part of the PJ initial filing transaction only when the tariff act citation in record identifier P15 is "1" (514 protest), and the application for further review indicator in record identifier P10 is "R" (further review requested). It is otherwise optionally used to supply additional protest detail information when the protestant has sought internal advice, knows the number of the lead protest approved for further review, or knows a test summons associated with a pending civil action filed before the U.S. Court of International Trade on the same class and category of merchandise, same issue.

Record Identifier P16 (PJ) (Input)								
Data Element	Length/ Class	Position	Status	Description	Note			
Control Identifier	1A	1	M	Must always equal P.				
Record Type	2N	2-3	M	Must always equal 16.				
Further Review Application Question #1	1A	4	С	A code indicating if a prior request has been made for further review of the same claim with respect to the same or substantially similar merchandise. Valid codes are:  Y = Yes N = No Space fill if further review is not requested in Record Identifier P10.				
Further Review Application Questions #2	1A	5	С	A code indicating if a final adverse decision from the U.S. Court of International Trade on the same claim with respect to the same category of merchandise or if action involving such a claim is pending before the U.S. Court of International Trade. Valid codes are:  Y = Yes N = No Space fill if further review is not requested in Record Identifier P10.				

Record Identifier P16 (PJ) (Input)								
Data Element	Length/ Class	Position	Status	Description	Note			
Further Review Application Question #3	1A	6	С	A code indicating if an adverse administrative decision from the Commissioner of Customs or his designee or if an application for an administrative decision on the same claim with respect to the same category of merchandise is pending. Valid codes are:  Y = Yes N = No Space fill if further review is not requested in Record Identifier P10.				
Internal Advice Number	5X	7-11	0	A number assigned by the Customs Office of Regulations and Rulings (OR&R) to a request from Customs personnel, the importer or other person of interest, for advice or guidance on the interpretation or proper application of the Customs and related laws with respect to the present transaction as provided in CFR 177.11. Cited here to justify suspension of this protest pending issuance of a ruling by OR&R.				
Filler	1A	12	M	Space fill.				
Lead Protest Number	12N	13-24	0	The Customs assigned number of any undecided protest filed by the protestant with respect to the same class and category of merchandise already approved for further review. Cited here to justify suspension of this protest pending decision of that other protest.				
Test Summons Number	9N	25-33	0	The number of an undecided civil action before the U.S. Court of International Trade which, as the result of a pleading from an attorney, has been designated by the Court as a test case, the decision of which will be applied to all associated civil actions (summonses). Cited here to justify suspension of this protest pending decision of that test action.				
Filler	47X	34-80	M	Space fill.				

### Record Identifier P30 (PJ) (Input)

This is a mandatory input record used in the PJ initial filing transaction to identify the protestant. When the protestant is the surety, this record is also used by the surety to certify that the protest is not filed in order to extend another authorized person's time to protest.

Record Identifier P30 (PJ) (Input)					
Data Element	Length/ Class	Position	Status	Description	Note
Control Identifier	1A	1	M	Must always equal P.	
Record Type	2N	2-3	M	Must always equal 30.	
Surety Certification	1A	4	С	A code indicating this 514 protest is not filed in order to extend another authorized person's time to protest.	
				X = Electronic signature of the surety.	
				Required with Protestant Type in position 5 is "S" (surety).	
Protestant Type	1A	5	M	A code indicating the protestant type. Valid codes are:	
				D = Drawback Claimant	
				F = Foreign Exporter/Producer I = Importer/Consignee	
				M = Ship's Master	
				O = Other	
				S = Surety	
				V = Vessel Operator	
				Type "F" applies to 181.115 interventions only.	
Protestant Identification Number	13X	6-18	M	A three- to thirteen-digit code identifying the protestant. The format of the protestant identification number depends upon the type of protestant indicated in position 5 of this record.	1
Protestant Name	32X	19-50	С	The name of the person or company filing or on whose behalf the protest is filed. Required when the Protestant Type in position 5 is "F" or "O" otherwise, leave blank.	
Filler	30X	51-80	M	Space fill.	

### Note 1

Valid formats for the Protestant Identification Number are:

Code	Description
NNN	Customs-assigned Surety Code
NN-NNNNNNXX	Employer Identification Number (EIN) or Internal Revenue Service
	Number
NNN-NN-NNNN	Social Security Number
YYDDPP-NNNNN	Customs-assigned Number (New format only)
AAANNNNN	Canadian Employer Number
AAANNNNN	Canadian Importer/Exporter Number
AAAAYYMMDDXXX	Mexican Federal Tax Registry Number (individual)
AAAYYMMDDXXX	Mexican Federal Tax Registry Number (corporate)

# Record Identifier P31 (PJ) (Input)

This is a conditional protest address input record required as part of the PJ initial filing transaction only when the protestant type listed in Record Identifier P30 is "Foreign Exporter/Producer" or "Other".

Record Identifier P	Record Identifier P31 (PJ) (Input)					
Data Element	Length/ Class	Position	Status	Description	Note	
Control Identifier	1A	1	M	Must always equal P.		
Record Type	2N	2-3	M	Must always equal 31.		
Protestant Mailing Address Line #1	32X	4-35	M	The street address of the protestant. A street address can contain up to 64 positions. The first 32 positions are reported here, the next 32 are reported in Record Identifier P32.		
Protestant City, Mailing Address	21X	36-56	M	The name of the city, spelled out in its entirety.		
Protestant State, Mailing Address	2A	57-58	С	The abbreviation for the state established by the U.S. Postal Service. Required for all U.S. states and provinces of Canada. Not accepted for Mexican states.		
Protestant ZIP or Postal Code	9X	59-67	С	For an U.S. address, a 5-9 position numeric ZIP Code established by the U.S. Postal Service. For a Canadian address, type a Canadian postal routing code in the format ANANAN. For a Mexican address, leave blank.		
Protestant Country	2A	68-69	С	The ISO code for the country. Valid codes are:  US = United States CA = Canada MX = Mexico		
Filler	11X	70-80	M	Space fill.		

# Record Identifier P32 (PJ) (Input)

This is a conditional protest address continuation input record. It is used only if the protestant address requires two lines.

Record Identifier P32 (PJ) (Input)						
Data Element	Length/ Class	Position	Status	Description	Note	
Control Identifier	1A	1	M	Must always equal P.		
Record Type	2N	2-3	M	Must always equal 32.		
Protestant Mailing Address Line #2	32X	4-35	M	The street address of the protestant. A street address can contain up to 64 positions. The first 32 positions are reported in Record Identifier P31, the second 32 are reported here.		
Filler	45X	36-80	M	Space fill.		

### Record Identifier P40 (PJ) (Input)

This is an optional protest refund care of (c/o) identification input record. It does not apply to 181.115 interventions. It should be used only when the party designated by the protestant to receive the refund is other than the party already designated to receive refunds on the Customs Form 4811. Any refund with respect to the entry(ies) under protest will be sent by Customs to the importer/consignee in care of the party identified here.

Record Identifier P	240 (PJ) (I	Input)			
Data Element	Length/ Class	Position	Status	Description	Note
Control Identifier	1A	1	M	Must always equal P.	
Record Type	2N	2-3	M	Must always equal 40.	
Filler	1A	4	M	Space fill.	
Refund C/O Party Type	1A	5	M	A code indicating the refund party type. Valid codes are:  B = Customs Broker D = Drawback Claimant I = Importer/Consignee M = Ship's Master S = Surety T = Attorney V = Vessel Owner/Operator	
Refund C/O Party Identification Number	12X	6-17	M	An eleven- to twelve-digit number identifying the refund c/o party. The format of the number depends on the type of refund c/o party indicated in position 5 of this record.	1
Filler	63X	18-80	M	Space fill.	

### Note 1

The number must be valid in the ACS Importer File. Valid formats for the Refund C/O Identification Number are:

Code	Description
NN-NNNNNNXX	Employer Identification Number (EIN) or Internal Revenue Service Number
NNN-NN-NNNN	Social Security Number
YYDDPP-NNNNN	Customs Assigned Number (new format only)

#### Note 1 - Continued

Valid Refund C/O Identification Number and Refund C/O Type combinations are:

ID Number Type

Employer Identification Number (EIN) B, D, I, M, S, T, V Internal Revenue Service (IRS)
Social Security
Customs ID

If the Refund C/O Identification number is in EIN/IRS format and has no suffix, positions 11 and 12 must be 00 (zero, zero). Otherwise, the number will be rejected. The identification number must exist in the ACS Importer File. The address used to mail the refund will be the one shown on the Importer File for the company associated with the identification number.

### Record Identifier P50 (PJ) (Input)

This is an optional protest substitute identification input record which is used in the PJ initial filing transaction to identify a party authorized by the protestant to receive notice of denial. This record does not apply to 181.115 interventions. Any substitute party used on a protest filed electronically via ABI must be a valid ABI filer so that notice can be transmitted electronically.

Record Identifier P50 (PJ) (Input)						
Data Element	Length/ Class	Position	Status	Description	Note	
Control Identifier	1A	1	M	Must always equal P.		
Record Type	2N	2-3	M	Must always equal 50.		
Filler	2A	4-5	M	Space fill.		
Substitute DDPP	4N	6-9	M	ABI processing DDPP of substitute party designated to receive notice of denial.		
Substitute Filer Code	3X	10-12	M	ABI filer code of the substitute party designated to receive notice of denial.		
Substitute Office Code	2X	13-14	0	ABI office code of the substitute party designated to receive notice of denial.		
Filler	66X	15-80	M	Space fill.		

### Record Identifier P60 (PJ) (Input)

This is an optional protest entry trailer input record. It is used in the PJ initial filing transaction to list the entry or entries associated with the 520 petition, 514 protest or 181.115 intervention. This record may be repeated up to 9,999 times.

Record Identifier P60 (PJ) (Input)					
Data Element	Length/ Class	Position	Status	Description	Note
Control Identifier	1A	1	M	Must always equal P.	
Record Type	2N	2-3	M	Must always equal 60.	
Sequence Number	4N	4-7	M	The sequence number 0001 to 9999, in ascending order.	
Filler	1A	8	M	Space fill.	
Entry Number	15X	9-23	M	The entry number associated with this petition/ protest/intervention. CFR 181.115(c)(3) requires that the foreign manufacturer or producer provide the number of each entry involved in the adverse country of origin marking decision. These entry numbers are available from the importer/consignee who filed the 514 NAFTA protest in which the foreign manufacturer or producer is intervening.	
Filler	57X	24-80	M	Space fill.	

# Record Identifier P70 (PJ) (Input)

This is a mandatory protest issue narrative input record used in the PJ initial filing transaction to concisely describe the protested decision/issue. The statement of the issue must be confined to a single P70 record.

Record Identifier P70 (PJ) (Input)						
Data Element	Length/ Class	Position	Status	Description	Note	
Control Identifier	1A	1	M	Must always equal P.		
Record Type	2N	2-3	M	Must always equal 70.		
Protested Decision/Issue	72X	4-75	M	Narrative concisely describing the protested decision of the Trade Compliance Process Owner, or matter subject to protest as set forth in CFR 174.11 and CFR 181.115.		
Filler	5X	76-80	M	Space fill.		

### Record Identifier P71 (PJ) (Input)

This is a mandatory protest merchandise description input record that is used in the PJ initial filing transaction to provide the commercial description of the merchandise associated with the protest or petition. The merchandise description must be confined to a single P71 record.

Record Identifier P71 (PJ) (Input)						
Data Element	Length/ Class	Position	Status	Description	Note	
Control Identifier	1A	1	M	Must always equal P.		
Record Type	2N	2-3	M	Must always equal 71.		
Merchandise Description	72X	4-75	M	The merchandise description as required by CFR 174.13 and CFR 181.115. This is also required for 520 petitions.		
Filler	5X	76-80	M	Space fill.		

### Record Identifier P90 (PJ) (Input)

This is a mandatory protest narrative input record. This record is used in the PJ initial filing transaction to describe the nature and justification for the objection set forth distinctly and specifically with respect to each category, payment, petition, decision or refusal. If an application for further review is contained in the protest in record identifiers P10 and P16, a justification under the criteria of 19 CFR 174.24 and 174.25 must also be provided in this narrative. In the case of 181.115 interventions, use this record to provide a complete statement of all relevant facts relating to the adverse marking decision and the transaction to which it relates. Include: the date of decision; a detailed statement as to why the exporter or producer believes the adverse marking decision is contrary to the provisions of Annex 311 of the NAFTA; a statement as to whether a Request for Basis of Adverse Marking Decision was filed under Section 181.113 of the Customs Regulations, and if so, the date of the request and the date any Customs response was issued under Section 181.114 of the Customs Regulations; a statement that the intervenor is the exporter or producer of the merchandise that was the subject of the adverse marking decision; if the intervenor is the exporter, a statement that they maintain sufficient records to enable Customs to evaluate the merits of their claim(s); and a statement as to whether the intervenor prefers that the principle of confidentiality set forth in Section 181.121 of the Customs Regulations be applied to the information submitted. This record may be repeated up to 9,999 times.

Record Identifier F	Record Identifier P90 (PJ) (Input)					
Data Element	Length/ Class	Position	Status	Description	Note	
Control Identifier	1A	1	M	Must always equal P.		
Record Type	2N	2-3	M	Must always equal 90.		
Sequence Number	4N	4-7	M	A sequence number 0001 to 9999, in ascending order. The sequence number should match the order in which Record Identifier P90 is transmitted.		
Justification/ Arguments	72X	8-79	M	Justification/arguments explaining the nature and justification for the objection set forth distinctly and specifically with respect to each category, payment, claim, decision, or refusal as required by CFR 174.13. If further review is requested, justification under the criteria of CFR 174.25 must also be provided using Record Identifier P90. If the action filed is a 181.115 intervention, detailed statements must be supplied as required by CFR 181.115(c)(5), (6), (7), (9), and (10).		
Filler	1X	80	M	Space fill.		

# Record Identifier P10 (QJ) (Input)

This is a mandatory input protest header record which is used in the QJ amendment transaction to apply for further review when further review was not requested at the time of initial filing or before the 90-day protest filing period has expired.

Record Identifier I	Record Identifier P10 (QJ) (Input)						
Data Element	Length/ Class	Position	Status	Description	Note		
Control Identifier	1A	1	M	Must always equal P.			
Record Type	2N	2-3	M	Must always equal 10.			
Protest Number	12N	4-15	M	The protest number assigned by Customs at the time of initial filing.			
Filer Reference Number	12X	16-27	M	The unique number assigned by the filer at the time of initial filing.			
Certification/ Signature	1A	28	С	A code of <i>X</i> that represents an electronic signature. Required if applying for further review in this record, or if filing additional narrative justification/additional arguments. Otherwise, leave this field blank.			
Inquiry Request Indicator	1A	29	O	A code identifying the type of query requested. Valid codes are:  1 = Status recap requested 2 = Full file requested Blank = No inquiry requested.  This request will only be processed if the amendment transmission is received error free.			
Application for Further Review	1A	30	0	A code <i>R</i> indicating that further review is requested under CFR 174.23. If further review is not requested, leave blank or space fill. Only 514 protests are eligible for further review.			
Filler	50X	31-80	M	Space fill.			

### Record Identifier P11 (QJ) (Input)

This is a conditional input protest header record that is used in the QJ amendment transaction to indicate that a sample or hardcopy material is being forwarded to Customs to substantiate the petition, protest or intervention. Transmit only if data is changed. If a sample or hardcopy was not previously sent, Record Identifier P11 can be used to indicate that they are now being sent.

Record Identifier P11 (QJ) (Input)					
Data Element	Length/ Class	Position	Status	Description	Note
Control Identifier	1A	1	M	Must always equal P.	
Record Type	2N	2-3	M	Must always equal 11.	
Hardcopy Indicator	1A	4	С	A code <i>S</i> indicating hardcopy materials are being sent by filer. If this indicator was set to "S" in Record Identifier P11 of the initial filing PJ transaction, it cannot be changed to "N" using the amendment QJ transaction.	1, 2
Filler	8A	5-12	M	Space fill.	
Sample Indicator	1A	13	С	A code <i>S</i> indicating a sample is being submitted by filer. If this indicator was set to "S" in Record Identifier P11 of the initial filing PJ transaction, it cannot be changed to "N" using the amendment QJ transaction.	
Filler	67X	14-80	M	Space fill.	

#### Note 1

Hardcopy materials do not include the CF-19 or a facsimile. Hardcopy is limited to those types of substantiating/supporting materials that cannot be entered electronically in the arguments/justification portion of the protest, (for example, blueprints, booklets, charts, diagrams, pamphlets, and photographs).

### Note 2

Samples and hardcopy materials must all be submitted directly to the Customs electronic filing location port. Local Custom ports will not be responsible for receiving or forwarding such materials to protest processing locations.

# Record Identifier P16 (QJ) (Input)

This is a conditional protest detail input record. This record applies only to 514 protests and is required only when further review is requested using Record Identifier P10 of the QJ amendment transaction.

Record Identifier	Record Identifier P16 (QJ) (Input)						
Data Element	Length/ Class	Position	Status	Description	Note		
Control Identifier	1A	1	M	Must always equal P.			
Record Type	2N	2-3	M	Must always equal 16.			
Further Review Application Question #1	1A	4	M	A code indicating if a prior request of Trade Compliance Process Owner for a further review of the same claim with respect to the same or substantially similar merchandise was made.			
				Y = Yes N = No			
Further Review Application Question #2	1A	5	M	A code indicating if a final adverse decision from the U.S. Court of International Trade on the same claim with respect to the same category of merchandise or if action involving such a claim pending before the U.S. Court of International Trade is pending.			
				Y = Yes N = No			
Further Review Application Question #3	1A	6	М	A code indicating an adverse administrative decision from the Commissioner of Customs or designee. Or an administrative decision on the same claim with respect to the same category of merchandise is pending.  Y = Yes N = No			
Internal Advice	5X	7-11	M	Space fill. Not used in the QJ transaction.			
Number	1 V	12	M	Smara fill			
Lead Protest Number	1X 12N	12 13-24	M M	Space fill. Not used in the QJ transaction.			
Test Summons Number	9N	25-33	M	Space fill. Not used in the QJ transaction.			
Filler	47X	34-80	M	Space fill.			

### Record Identifier P30 (QJ) (Input)

This is a conditional protest identification input record that is used in the QJ amendment transaction to correct protestant name and address information. This record can be used only when the protestant type is "F" (Foreign Exporter/Producer) or "O" (Other).

Record Identifier P30 (QJ) (Input)					
Data Element	Length/ Class	Position	Status	Description	Note
Control Identifier	1A	1	M	Must always equal P.	
Record Type	2N	2-3	M	Must always equal 30.	
Action Code	1A	4	M	A code of <i>C</i> to Correct protestant name/address.	
Protestant Type	1A	5	M	A code indicating the protestant type. Valid codes are:  F = Foreign Exporter/Producer O = Other	
Protestant Identification Number	13X	6-18	M	A nine- to thirteen-digit code identifying the protestant. The format of the protestant identification number depends upon the type of protestant indicated in position 5 of this record.	1
Protestant Name	32X	19-50	M	The name of person or company on whose behalf the protest is filed.	
Filler	30X	51-80	M	Space fill.	

#### Note 1

Valid formats for the Protestant Identification Number are:

Code	Description
NN-NNNNNNXX	Employer Identification Number (EIN) or Internal Revenue Service Number
NNN-NN-NNNN	Social Security Number
AAANNNNN	Canadian Employer Number
AAANNNNN	Canadian Importer/ Exporter Number
AAAAYYMMDDXXX	Mexican Federal Tax Registry Number (Individual)
AAAYYMMDDXXX	Mexican Federal Tax Registry Number (Corporate)

### Note 1 – Continued

Valid protestant identification number and protestant type combination is:

ID Number	Type
Employer Identification Number (EIN) Internal Revenue Service (IRS) Social Security Number	О
Mexican Tax Registry Number	F
Canadian Employer/Exporter Number	F

If the Protestant Identification Number is in EIN/IRS format and has no suffix, positions 11 and 12 must be 00 (zero, zero). Otherwise the number will be rejected.

# Record Identifier P31 (QJ) (Input)

This is a conditional protest address input record that is used in the QJ amendment transaction only when the address portion of the protestant information is to be corrected for foreign exporter/producer and other type protestants.

Record Identifier P31 (QJ) (Input)					
Data Element	Length/ Class	Position	Status	Description	Note
Control Identifier	1A	1	M	Must always equal P.	
Record Type	2N	2-3	M	Must always equal 31.	
Protestant Mailing Address Line #1	32X	4-35	M	The street address of the protestant. A street address can contain up to 64 positions. The first 32 positions are reported here, the next 32 are reported in Record Identifier P32.	
Protestant City, Mailing Address	21X	36-56	M	The name of the city, spelled out in its entirety.	
Protestant State, Mailing Address	2A	57-58	С	The 2-letter abbreviation for the state established by the U.S. Postal Service. Required for U.S. states and provinces of Canada. Not accepted for Mexican states.	
Protestant ZIP or Postal Code	9X	59-67	С	For an U.S. address, a 5-9 position numeric ZIP Code established by the U.S. Postal Service. For a Canadian address, type a Canadian postal routing code in the format ANANAN. For a Mexican address, leave blank.	
Protestant Country	2A	68-69	С	The ISO code for the country. Valid codes are:  US = United States CA = Canada MX = Mexico	
Filler	11X	70-80	M	Space fill.	

# Record Identifier P32 (QJ) (Input)

This is a conditional protest address continuation input record. It is used in the QJ amendment transaction only if the protestant address begun in Record Identifier P31 requires two lines.

Record Identifier P32 (QJ) (Input)									
Data Element	Length/ Class	Position	Status	Description	Note				
Control Identifier	1A	1	M	Must always equal P.					
Record Type	2N	2-3	M	Must always equal 32.					
Protestant Mailing Address Line #2	32X	4-35	M	The street address of the protestant. A street address can contain up to 64 positions. The first 32 positions are reported in Record Identifier P31, the second 32 are reported here.					
Filler	45X	36-80	M	Space fill.					

## Record Identifier P40 (QJ) (Input)

This is an optional protest refund care of (c/o) identification input record used in the QJ amendment transaction to add or replace a refund c/o party. It does not apply to 181.115 interventions. It should be used only when the party designated by the protestant to receive the refund is other than the party already designated to receive refunds on the Customs Form 4811. Any refund with respect to the entry(ies) under protest will be sent by Customs to the importer/consignee in care of the party identified here.

Record Identifier F	P40 (QJ) (A	Input)			
Data Element	Length/ Class	Position	Status	Description	Note
Control Identifier	1A	1	M	Must always equal P.	
Record Type	2N	2-3	M	Must always equal 40.	
Action Code	1A	4	M	A code indicating the action code. Valid codes are:  A = Add refund c/o party to protest record R = Replace refund c/o party	
Refund C/O Party Type	1A	5	M	A code indicating the refund c/o party type. Valid codes are:  B = Broker D = Drawback Claimant I = Importer/Consignee M = Ship's Master S = Surety T = Attorney V = Vessel Owner/Operator	
Refund C/O Party Identification Number	13X	6-18	M	An eleven- to twelve-digit code identifying the refund c/o party. The format of the refund c/o identification number depends on the type of party indicated in position 5 of this record. Leave thirteenth position blank.	1
Filler	62X	19-80	M	Space fill.	

#### Note 1

Valid formats for the Refund C/O Identification Number are:

**Code Description** 

NN-NNNNNXX Employer Identification Number (EIN) or Internal Revenue Service

Number

NNN-NN-NNNN Social Security Number

YYDDPP-NNNNN Customs Assigned Number (new format only)

Valid Refund C/O Identification Number and Refund C/O Type combinations are:

ID Number Type

Employer Identification Number (EIN) B, D, I, M, S, T, V Internal Revenue Service (IRS)
Social Security
CUSTOMS ID

If the Protestant Identification Number is in EIN/IRS format and has no suffix, positions 11 and 12 must be 00 (zero, zero). Otherwise, the number will be rejected. The identification number must exist in the ACS Importer File. The address used to mail the refund will be the one shown on the Importer File for the company associated with the identification number.

## Record Identifier P50 (QJ) (Input)

This is an optional protest substitute identification input record which is used in the QJ amendment transaction to identify a party authorized by the protestant to receive notice of denial. This record does not apply to 181.115 interventions. Any substitute party used on a protest filed electronically via ABI must be a valid ABI filer so that the notice of denial can be transmitted electronically.

Record Identifier P	Record Identifier P50 (QJ) (Input)							
Data Element	Length/ Class	Position	Status	Description	Note			
Control Identifier	1A	1	M	Must always equal P.				
Record Type	2N	2-3	M	Must always equal 50.				
Action Code	1A	4	M	A code indicating the action code. Valid codes are:  A = Add substitute to protest R = Replace substitute				
Filler	1A	5	M	Space fill.				
Substitute DDPP	4N	6-9	M	The ABI processing DDPP of the substitute party designated to receive notice of denial.				
Substitute Filer Code	3X	10-12	M	The ABI filer code of the substitute party designated to receive notice of denial.				
Substitute Office Code	2X	13-14	С	The ABI office code of the substitute party designated to receive notice of denial.				
Filler	66X	15-80	M	Space fill.				

## Record Identifier P60 (QJ) (Input)

This is an optional protest entry trailer input record. It is used in the QJ amendment transaction to withdraw an entry from a protest or 520 petition. It is not used for 181.115 interventions. This record may be repeated up to 9,999 times.

Record Identifier P60 (QJ) (Input)							
Data Element	Length/ Class	Position	Status	Description	Note		
Control Identifier	1A	1	M	Must always equal P.			
Record Type	2N	2-3	M	Must always equal 60.			
Sequence Number	4N	4-7	M	The sequence number 0001 to 9999, in ascending order.			
Action Code	1A	8	M	A code of <i>W</i> indicating the withdraw entry type.			
Entry Number	15X	9-23	M	The entry number that was withdrawn.			
Filler	57X	24-80	M	Space fill.			

### Record Identifier P90 (QJ) (Input)

This is an optional protest narrative input record regarding an application for further review. This record is used in the QJ amendment transaction to state any facts or additional legal arguments not part of the existing protest record upon which the protesting party relies, including the criterion set forth in CFR 174.24 which justifies further review. A showing of facts that support the allegation of a criterion set forth in CFR 174.24(c) will constitute grounds for granting further review in circumstances where the applicant's inability to affirmatively make the allegations described in CFR 174.25(b)(2) would otherwise result in its denial. This record can also be used for a 514 protest anytime prior to the end of the 90-day filing period to assert additional claims regarding the administrative decision which is the subject of the protest, or to challenge an additional administrative decision relating to the same category of merchandise which is the subject of the protest as provided in CFR 174.14. Amended narrative is not accepted in the case of 520(c) and 520(d) petitions, but may be used for 181.115 interventions. This record may be repeated up to 9,999 times. For presentation of additional grounds or arguments in support of a valid protest after the 90-day filing/amendment period has expired (as explained in CFR 174.28), use the RJ Addenda transaction.

Record Identifier P	90 (QJ) (A	Input)			
Data Element	Length/ Class	Position	Status	Description	Note
Control Identifier	1A	1	M	Must always equal P.	
Record Type	2N	2-3	M	Must always equal 90.	
Sequence Number	4N	4-7	M	A sequence number 0001 to 9999, in ascending order. The repeat of Record Identifier P90 should match the sequence number. If this is the first Record Identifier P90 in the QJ transaction, the sequence number should equal 0001.	
Nature/Justification Narrative	72X	8-79	M	Statement of the nature and justification for the objection raised by the amendment set forth distinctly and specifically with respect to each category, payment, claim, decision or refusal; and/or a statement of criterion for further review.	
Filler	1X	80	M	Space fill.	

# Record Identifier P10 (RJ) (Input)

This is a mandatory input protest header record that is used in the RJ addenda transaction to provide electronic signature required when filing additional justification or arguments.

Record Identifier P	P10 (RJ) (A	Input)			
Data Element	Length/ Class	Position	Status	Description	Note
Control Identifier	1A	1	M	Must always equal P.	
Record Type	2N	2-3	M	Must always equal 10.	
Protest Number	12N	4-15	M	The number assigned by Customs at the time of initial filing.	
Filer Reference Number	12X	16-27	M	The unique number assigned by the filer at the time of initial filing.	
Certification/ Signature	1A	28	С	A code of <i>X</i> that indicates an electronic signature is required when filing additional justification/ arguments.	
Inquiry Request Indicator	1A	29	0	A code identifying the type of query requested. Valid codes are:  1 = Status recap requested 2 = Full file requested Blank = No inquiry requested.	
Filler	51X	30-80	M	Space fill.	

# Record Identifier P11 (RJ) (Input)

This is a conditional input protest header record that is used in the RJ addenda transaction to indicate that a sample and/or hardcopy material is being forwarded to Customs to substantiate the claim, protest or intervention.

Record Identifier P	P11 (RJ) (A	Input)			
Data Element	Length/ Class	Position	Status	Description	Note
Control Identifier	1A	1	M	Must always equal P.	
Record Type	2N	2-3	M	Must always equal 11.	
Hardcopy Indicator	1A	4	С	A code identifying the hardcopy indicator. Valid codes are:  S = Hardcopy materials sent by filer N = No hardcopy materials.  If this indicator was set to "S" in Record Identifier P11 of the initial filing PJ transaction or amendment QJ transaction, it cannot be changed to "N" using the addenda RJ transaction.	1,2
Filler	8A	5-12	M	Space fill.	
Sample Indicator	1A	13	С	A code identifying the sample indicator. Valid codes are:  S = Sample submitted by filer. N = No sample.  If this indicator was set to "S" in Record Identifier P11 of the initial filing PJ transactions or amendment QJ transaction, it cannot be changed to "N" using the addenda RJ transaction.	2
Filler	67X	14-80	M	Space fill.	

#### Note 1

Hardcopy materials do not include the CF-19 or facsimile. Hardcopy is limited to those types of substantiating/supporting materials that cannot be entered electronically in the arguments/justification portion of the protest; (for example, blueprints, booklets, charts, diagrams, pamphlets, and photographs).

#### Note 2

Samples and hardcopy materials must all be submitted directly to the Customs electronic filing location DDPP. Local Customs ports will not be responsible for receiving or forwarding such materials to protest processing locations.

## Record Identifier P40 (RJ) (Input)

This is an optional protest refund care of (c/o) identification input record used in the RJ addenda transaction to add or replace a refund c/o party. It does not apply to 181.115 interventions. It should be used only when the party designated by the protestant to receive the refund is other than the party already designated to receive refunds on the Customs Form 4811. Any refund with respect to the entry(ies) under protest will be sent by Customs to the importer/consignee in care of the party identified here.

Record Identifier	P40 (RJ) (I	Input)			
Data Element	Length/ Class	Position	Status	Description	Note
Control Identifier	1A	1	M	Must always equal P.	
Record Type	2N	2-3	M	Must always equal 40.	
Action Code	1A	4	М	A code identifying what action to be taken. Valid codes are:	
				A = Add refund c/o party to protest record R = Replace refund c/o party	
Refund C/O Party Type	1A	5	M	A code indicating the type of refund c/o party type. Valid codes are:  B = Broker D = Drawback Claimant I = Importer/Consignee M = Ship's Master S = Surety T = Attorney V = Vessel Owner/Operator	
Refund C/O Party Identification Number	13X	6-18	M	An eleven- to twelve-digit code identifying the refund c/o party. The format of the refund c/o identification number depends upon the type of refund c/o party indicated in position 5 of this record. Leave the thirteenth position blank.	1
Filler	62X	19-80	M	Space fill.	

#### Note 1

Valid formats for the Refund C/O Identification Number are:

**Code Description** 

NN-NNNNNXX Employer Identification Number (EIN) or Internal Revenue Service

Number

NNN-NN-NNNN Social Security Number

YYDDPP-NNNNN Customs Assigned Number (new format only)

Valid Refund C/O Identification Number and Refund C/O Type combinations are:

ID Number Type

Employer Identification Number (EIN) B, D, I, M, S, T, V Internal Revenue Service (IRS)
Social Security
Customs ID

If the Refund C/O Identification Number is in EIN/IRS format and has no suffix, positions 11 and 12 must be 00 (zero, zero). Otherwise, the number will be rejected. The identification number must exist in the ACS Importer File. The address used to mail the refund will be the one shown on the Importer File for the company associated with the identification number.

## Record Identifier P50 (RJ) (Input)

This is an optional protest substitute identification input record which is used in the RJ addenda transaction to identify a party authorized by the protestant to receive notice of denial. This record does not apply to 181.115 interventions. Any substitute party used on a protest filed electronically via ABI must be a valid ABI filer so that the notice of denial can be transmitted electronically.

Record Identifier P	Record Identifier P50 (RJ) (Input)							
Data Element	Length/ Class	Position	Status	Description	Note			
Control Identifier	1A	1	M	Must always equal P.				
Record Type	2N	2-3	M	Must always equal 50.				
Action Code	1A	4	M	A code identifying the action to be taken. Valid codes are:  A = Add substitute to protest R = Replace substitute				
Filler	1A	5	M	Space fill.				
Substitute DDPP	4N	6-9	M	The ABI processing DDPP of the substitute party designated to receive notice of denial.				
Substitute Filer Code	3X	10-12	M	The ABI filer code of the substitute party designated to receive notice of denial.				
Substitute Office Code	2X	13-14	С	The ABI office code of the substitute party designated to receive notice of denial.				
Filler	66X	15-80	M	Space fill.				

## Record Identifier P60 (RJ) (Input)

This is an optional protest entry trailing input record. It is used in the RJ addenda transaction to withdraw an entry from a protest or 520 petition. It is not used for 181.115 interventions. This record may be repeated up to 9,999 times.

Record Identifier P	Record Identifier P60 (RJ) (Input)								
Data Element	Length/ Class	Position	Status	Description	Note				
Control Identifier	1A	1	M	Must always equal P.					
Record Type	2N	2-3	M	Must always equal 60.					
Sequence Number	4N	4-7	M	The sequence number 0001 to 9999, in ascending order of entry numbers.					
Action Code	1A	8	M	A code of <i>W</i> indicating the withdraw entry.					
Entry Number	15X	9-23	M	The entry number being withdrawn.					
Filler	57X	24-80	M	Space fill.					

### Record Identifier P90 (RJ) (Input)

This is a conditional protest narrative input record used in the RJ addenda transaction to submit alternative claims and additional grounds or arguments after the 90-day filing period of the 514 protest has expired and any time prior to disposition (decision) of the protest as provided in Section 174.28 of the Customs Regulations. This record may be repeated up to 9,999 times.

Record Identifier H	P90 (RJ) (A	Input)			
Data Element	Length/ Class	Position	Status	Description	Note
Control Identifier	1A	1	M	Must always equal P.	
Record Type	2N	2-3	M	Must always equal 90.	
Sequence Number	4N	4-7	M	Sequence number 0001 to 9999, in ascending order from that represents the order. The repeat of Record Identifier P90 should match the sequence number. If this is the first Record Identifier P90 in the RJ transaction, the sequence number should equal 0001.	
Alternative Claims/Additional Grounds or Arguments	72X	8-79	M	Statement of the alternative claims, additional ground or arguments, set forth distinctly and specifically with respect to each alternative claim, additional ground or argument.	1
Filler	1X	80	M	Space fill.	

#### Note 1

Section 174.28 of the Customs Regulations provides for consideration of additional arguments. It states, "In any case in which alternative claims or additional grounds or arguments are submitted orally, they shall be considered in the allowance or denial of the protest only if submitted in writing in conjunction with, or no later than 60-days after such oral submission." In the case of an ABI protest, oral presentation will be followed by electronic transmission of the RJ transaction with the appropriate number of P90 records. A date and time record of receipt of the error-free RJ transaction with the P90 record(s) will be kept by Customs in ACS to distinguish it from the initial filing or amendment narrative.

## Record Identifier P10 (SJ) (Input)

This is a mandatory input protest header record used in the SJ service request transaction to request review of application for further review (AFR) denial; request voidance of denial of a 514 protest; request accelerated disposition; or withdraw a 514 protest, 520(c) or 520(d) petition, or an 181.115 intervention.

Record Identifier F	, , ,	<b>*</b> /			
Data Element	Length/ Class	Position	Status	Description	Note
Control Identifier	1A	1	M	Must always equal P.	
Record Type	2N	2-3	M	Must always equal 10.	
Protest Number	12N	4-15	M	The number assigned by Customs to the 514 protest, 520(c) or (d) petition, or 181.115 intervention filed via ABI.	
Filer Reference Number	12X	16-27	M	The unique number assigned by the filer to the 520 petition, 514 protest, or 181.115 intervention.	
Certification/ Signature	1A	28	M	A code of <i>X</i> that represents the electronic signature of the protestant or the party filing on behalf of the protestant.	
Inquiry Request Indicator	1A	29	0	A code identifying the query request. Valid codes are:  1 = Status Recap requested 2 = Full file requested Blank = No inquiry requested.  This request will only be processed if the SJ service request transmission is received error free.	
Filler	9X	30-38	M	Space fill.	
Request Review of AFR Denial Indicator	1A	39	О	A code identifying <i>R</i> as the Review of AFR denial is requested under Section 515 (19 U.S.C. 1515)(c). If review of AFR denial is not requested, transmit a space in this place.	1,2
Filler	8X	40-47	M	Space fill.	
Request Denial Be Voided	1A	48	О	A code identifying <i>R</i> that the Denial be voided is requested under Section 515 (19 U.S.C. 1515)(d). If voidance is not requested, transmit a space in this place.	1,3
Filler	8X	49-56	M	Space fill.	

Record Identifier P10 (SJ) (Input)								
Data Element	Length/ Class	Position	Status	Description	Note			
Accelerated Disposition Indicator	1A	57	0	A code identifying <i>R</i> as the Accelerated Disposition requested under Section 174.22 of the Customs Regulations. If accelerated disposition is not requested, transmit a space in this place.	1,4			
Filler	8X	58-65	M	Space fill.				
Withdrawal Indicator	1A	66	0	A code identifying <i>W</i> as the Withdraw protest/claim/ intervention. If withdrawal is not requested, transmit a space in this place. May be accomplished anytime prior to disposition of the protest (Customs decision).				
Filler	14X	67-80	M	Space fill.				

#### Note 1

Only 514 protests are eligible.

#### Note 2

Such request must be filed within 60-days after the date of notice of the denial. The Commissioner of Customs will conduct the review based solely on the information before Customs at the time the application for further review was denied.

## Note 3

Such request must be filed with the appropriate Trade Compliance Process Owner within 90-days after the date of the protest denial.

### Note 4

Such request must be made anytime after 90-days from the filing of the protest.

### Record Identifier P90 (SJ) (Input)

This is an optional protest narrative input record used in the SJ service request transaction to submit appropriate remarks when requesting accelerated disposition; withdrawing a protest, petition or intervention; or to submit remarks explaining why the protestant feels the protest was denied contrary to proper instructions when the SJ transaction is used to request denial of a 514 protest be voided. It may not be used in conjunction with the request for review of application for further review (AFR) denial. The Commissioner of Customs will, in the case of request for review of AFR denial, conduct the review based solely on the information before Customs at the time the application for further review was denied. This record may be repeated up to 9,999 times.

Record Identifier P	90 (SJ) (I	nput)			
Data Element	Length/ Class	Position	Status	Description	Note
Control Identifier	1A	1	M	Must always equal P.	
Record Type	2N	2-3	M	Must always equal 90.	
Sequence Number	4N	4-7	M	A sequence number 0001 to 9999, in ascending order that represents the order. The repeat of Record Identifier P90 should match the sequence number. If this is the first Record Identifier P90 in the SJ transaction, the sequence number should equal 0001.	
Narrative Remarks	72X	8-79	M	Statement of the remarks advancing the request for accelerated disposition; explaining why the protestant wishes to withdraw the protest, petition or intervention; or explain why the protestant thinks the protest was denied contrary to proper instructions.	
Filler	1X	80	M	Space fill.	

## Record Identifier P10 (SS) (Output)

This is a protest header output record that is used in the SS inquiry/notification transaction to transmit protest data to the ABI filer. This record is required for each notification transmission and is required for both the recap inquiry and the full file inquiry.

Record Identifier P	210 (SS) (C	Output)			
Data Element	Length/ Class	Position	Status	Description	Note
Control Identifier	1A	1	M	Must always equal P.	
Record Type	2N	2-3	M	Must always equal 10.	
Protest Number	12N	4-15	M	The protest number assigned by Customs at the time of initial filing.	
Filer Reference Number	12X	16-27	M	The unique number assigned by filer to the 520 petition, 514 protest or 181.115 intervention at the time of initial filing.	
Notification Reason Indicator	1A	28	M	A code indicating the notification reason. Valid codes are:  1 = Inquiry request from filer 2 = Notification issued by Customs 3 = Notification generated by third party action.	
Service Level Indicator	1A	29	О	A code indicating the service level. Valid codes are:  1 = Status recap requested 2 = Full file requested	
Application for Further Review	1A	30	О	A code indicating further review. Valid codes are:  R = Requested A = Approved D = Denied	
Application for Further Review Date	8N	31-38	С	Date of application for further review in CCYYMMDD format.	
Request Review of Denial of Application for Further Review Indicator	1A	39	О	A code indicating the request for review.  Valid codes are:  R = Requested A = Approved D = Denied	

Record Identifier P	10 (SS) (C	Output)			
Data Element	Length/ Class	Position	Status	Description	Note
Review of Denial of Application for Further Review Date	8N	40-47	С	The date the request for review was made, approved, or denied. Example: If the letter transmitted in position 39 is "A", the date in positions 40-47 will be the date Customs approved the review of denial of the application for further review. The format for this field is CCYYMMDD.	
Request Denial of 514 Protest be Voided Indicator	1A	48	0	A code indicating the request of denial. Valid codes are:  R = Requested A = Approved D = Denied	
Request Denial of 514 Protest be Voided Date	8N	49-56	С	The date the request for voidance was made, approved, or denial was denied. Example: If the letter transmitted in position 48 is "R", the date in positions 49-56 will be the date the protestant requested denial be voided. The format for this field is CCYYMMDD.	
Accelerated Disposition Request Indicator	1A	57	О	A code indicating the request for accelerated disposition. Valid codes are:  R = Requested A = Approved D = Denied	
Accelerated Disposition Date	8N	58-65	С	The date the request for accelerated disposition was approved, or denied. Example: If the letter transmitted in position 57 is "D", the date in positions 58-65 will be the date the request for accelerated disposition was denied.	

Record Identifier P	210 (SS) (C	Output)			
Data Element	Length/ Class	Position	Status	Description	Note
Protest Status Indicator	1A	66	M	The current status of the protest or 520 petition. Valid codes are:	
				A = Approved D = Denied N = Not Protestable O = Open P = Partly Denied S = Suspended U = Untimely Denied W = Withdrawn	
				For 181.115 interventions the status reported here is the status, not of the intervention itself, because an intervention does not get "decided", but is instead the status of the 514 NAFTA protest in which the intervention was made. Each time the status of that 514 protest changes, the status of the 181.115 intervention will be updated to reflect the identical status.	
Protest Status Date	8N	67-74	M	The date in CCYYMMDD format on which the status was assigned to the protest by Customs. For 181.115 interventions the status date reported here is the status date, not of the intervention itself, but the status date of the 514 NAFTA protest in which the intervention was made. Each time the status of that 514 protest changes, the status date of the 181.115 intervention will be updated to reflect the identical status date.	
Filler	6X	75-80	M	Space fill.	

## Record Identifier P11 (SS) (Output)

This is a protest header continuation output record that is used in the SS inquiry/notification transaction to transmit data regarding sample and hardcopy materials, facsimile and current team assignment to the ABI filer. This record is required for each notification transmission and is required for both the recap and the full file inquiry.

Record Identifier H	P11 (SS) (0	Output)			
Data Element	Length/ Class	Position	Status	Description	Note
Control Identifier	1A	1	M	Must always equal P.	
Record Type	2N	2-3	M	Must always equal 11.	
Hardcopy Indicator	1A	4	С	A code indicating the hardcopy. Valid codes are:	
				S = Hardcopy materials sent by filer N = No hardcopy materials submitted by filer R = Hardcopy materials received by Customs	
Hardcopy Receipt Date	8N	5-12	С	The date in CCYYMMDD format on which Customs received the hardcopy materials.	
Sample Indicator	1A	13	С	A code indicating the sample. Valid codes are:	
				S = Sample submitted by filer N = No sample submitted by filer R = Sample received by Customs	
Sample Receipt Date	8N	14-21	С	The date in CCYYMMDD format on which Customs received the sample.	
FAX Indicator	1A	22	С	A code indicating the status of the FAX. Valid codes are:	
				S = Facsimile sent by filer N = No facsimile	
FAX Sent Date	8A	23-30	С	The date in CCYYMMDD format on which the facsimile was sent to Customs.	
Team	3X	31-33	С	A code representing the Customs office currently assigned to the protest, claim, or intervention.	
Team Assignment Date	8N	34-41	С	The date in CCYYMMDD format the team was assigned the protest, petition or intervention.	
Filler	39X	42-80	M	Space fill.	

## Record identifier P12 (SS) (Output)

This is a protest processing status output record which is used in the SS inquiry/notification transaction to transmit data regarding the processing status of the protest. This record is transmitted when data for these fields exists. When processing status data exists, Record Identifier P12 is required for each notification transmission and is required for both the recap inquiry and full file inquiry.

Record Identifier P	Record Identifier P12 (SS) (Output)								
Data Element	Length/ Class	Position	Status	Description	Note				
Control Identifier	1A	1	M	Must always equal P.					
Record Type	2N	2-3	M	Must always equal 12.					
Processing Status Code	3X	4-6	M	A code used by Customs to indicate a certain stage in the life cycle of the protest or claim.					
Processing Status Date	8N	7-14	M	The date in CCYYMMDD format the processing status was assigned by Customs.					
Processing Status Description	60X	15-74	M	A narrative naming or describing the process represented by the code in positions 7-14.					
Filler	6X	75-80	M	Space fill.					

## Record Identifier P13 (SS) (Output)

This is an optional protest detail output record used in the SS inquiry/notification transaction. When a 514 protest or 520 petition is denied in whole or in part (protest status is denied, partly denied, untimely denied) and data for these data fields exists, this record is transmitted to the ABI filer as part of the notification of Customs decision. This record is also transmitted as part of a full file inquiry request. This record can be repeated up to five times.

Record Identifier P	Record Identifier P13 (SS) (Output)									
Data Element	Length/ Class	Position	Status	Description	Note					
Control Identifier	1A	1	M	Must always equal P.						
Record Type	2N	2-3	M	Must always equal 13.						
Sequence Number	4N	4-7	M	Sequence number 0001 to 0005, in ascending order. Represents the numerical order in which this line occurs in the narrative.						
Decision Narrative	73X	8-80	M	The narrative statement from the reviewing Customs officer stating the reason for denial.						

# Record Identifier P15 (SS) (Output)

This is a protest detail output record used in the SS inquiry/notification transaction to transmit data identifying the type of action that was filed with Customs. This record is transmitted only when a full file inquiry is requested.

Record Identifier P	15 (SS) (C	Output)			
<b>Data Element</b>	Length/ Class	Position	Status	Description	Note
Control Identifier	1A	1	M	Must always equal P.	
Record Type	2N	2-3	M	Must always equal 15.	
Filing DDPP	4N	4-7	M	District-port code of the Trade Compliance Process Owner whose decision is protested.	
Tariff Act Citation	1N	8	С	A code indicating the Tariff Act Citation. Valid codes are:	
				1 = Section 514 protest 2 = Section 520(c) petition 3 = Section 520(d) petition 4 = Section 181.115 intervention	
Associated 520 Petition Number	12N	9-20	С	The Customs assigned number identifying the previously denied 520(c) or (d) petition. Required when protesting denial of a 520(c) or 520(d) petition.	
Associated Protest Number	12N	21-32	С	For 181.115 interventions, the number identifying the 514 protest of adverse country of origin marking decision under NAFTA into which the foreign manufacturer/producer intervened. For 514 NAFTA protests, the number identifying the 181.115 intervention, if any, filed by the foreign manufacturer/producer.	
Protest/ Amendment Period Base Date	8N	33-40	С	Protest/amendment period base date in CCYYMMDD format. Required when no associated 520 petition or 514 protest is provided, except when one or more Record Identifier P60's are transmitted as part of the PJ transaction in which case timeliness will be based on the entry date of liquidation. Does not apply to 181.115 interventions.	

Record Identifier P	Record Identifier P15 (SS) (Output)								
Data Element	Length/ Class	Position	Status	Description	Note				
Protest/Amendment Period Base Date Qualifier	1N	41	C	A code indicating a protest/amendment period base date. Valid codes are:  1 = Date of notification of decision adverse to the importer.  2 = Date of notification of adverse country of origin marking decision under NAFTA.  3 = Date of exaction.  4 = Date of notification of demand for payment against a bond in the case of a surety.  This qualifier is required when a protest/amendment period date is used. Does not apply to 181.115 interventions.					
Filler	39X	42-80	M	Space fill.					

## Record Identifier P16 (SS) (Output)

This is a protest detail output record. It applies to 514 protests only, not to 520 petitions or 181.115 interventions. As part of the SS inquiry/notification transaction, this record is used to transmit data pertaining to further review, internal advice, lead protests and test cases and rulings associated with a protest. It is transmitted only when a full file inquiry is requested and then only when data for these fields is found on the protest records in ACS.

Record Identifier	P16 (SS) (C	Output)			
Data Element	Length/ Class	Position	Status	Description	Note
Control Identifier	1A	1	M	Must always equal P.	
Record Type	2N	2-3	M	Must always equal 16.	
Further Review Application Question #1	1A	4	С	A code indicating a request of a Trade Compliance Process Owner for further review of the same claim with respected to the same or substantially similar merchandise.  Y = Yes N = No	
				Space fill if further review is not requested.	
Further Review Application Question #2	1A	5	С	A code indicating a final adverse decision from the U.S. Court of International Trade on the same claim with respect to the same category of merchandise. Or an action involving such a claim pending before the U.S. Court of International Trade is pending.	
				Y = Yes N = No Space fill if further review is not requested.	
Further Review Application Question #3	1A	6	С	A code indicating an adverse administrative decision from the Commissioner of Customs or designee has been received or an application for an administrative decision on the same claim with respect to the same category of merchandise is pending.	
				Y = Yes N = No Space fill if further review is not requested.	

Record Identifier	P16 (SS) (0	Output)			
Data Element	Length/ Class	Position	Status	Description	Note
Internal Advice Number	5X	7-11	0	A number assigned by the Customs Office of Regulations and Rulings (OR&R) to a request from Customs personnel, the importer or other person of interest, for advice or guidance as to the interpretation or proper application of the Customs and related laws with respect to this present transaction as provided in CFR 177.11.	
Filler	1A	12	M	Space fill.	
Lead Protest Number	12N	13-24	0	The Customs-assigned number of any undecided 514 protest filed by the protestant with respect to the same class and category of merchandise already approved for further review and cited to justify suspension of this 514 protest pending decision of that other 514 protest.	
Test Summons Number	9N	25-33	О	The number of an undecided civil action before the U.S. Court of International Trade which, as the result of a pleading from an attorney, has been designated by the court as a test case, the decision of which will be applied to all associated civil actions (summons). Cited to justify suspension of this protest pending decision of that test case.	
Case Number	7AN	34-40	С	The case number assigned to this 514 protest by OR&R when further review is undertaken.	
Case Status	1A	41	С	A code identifying the case status. Valid codes are:  A = Assigned C = Closed	
Date Closed	8N	42-49	С	The date in CCYYMMDD format the OR&R case was closed.	
Office of Regulations and Rulings	31X	50-80	С	The name of the division and branch within OR&R that is assigned the case.	

## Record Identifier P17 (SS) (Output)

This is a protest detail output record. It is used as part of the SS inquiry/notification transaction to transmit data relating to any summons associated with a denied 514 protest. This record is transmitted only when a full file inquiry is requested and then only if data for these fields exists in ACS. If more than one summons has been issued against the protest, this record will be repeated as often as necessary.

Record Identifier P17 (SS) (Output)					
Data Element	Length/ Class	Position	Status	Description	Note
Control Identifier	1A	1	M	Must always equal P.	
Record Type	2N	2-3	M	Must always equal 17.	
Summons Number	9N	4-12	M	The number of the summons issued to Customs from the U.S. Court of International Trade citing this protest.	
Summons Date	8N	13-20	M	The date in CCYYMMDD format of the summons.	
Filler	60X	21-80	M	Space fill.	

### **Record Identifier P20 (SS) (Output)**

This is a protest filer identification output record. It is used as part of the SS inquiry/notification transaction to transmit data identifying third parties who have filed amendments to the initial filing of any 520 petition, 514 protest or intervention. It is transmitted only when a full file inquiry has been requested and then only when third party filer data exists. It will be repeated as often as necessary. When notification is transmitted to the initial filer, Record Identifiers P20 and P21 will be transmitted for each party that amended the protest record. When notification is transmitted to amending parties, Record Identifiers P20 and P21 will be transmitted identifying the initial filer and any other amending filers.

Record Identifier P20 (SS) (Output)						
Data Element	Length/ Class	Position	Status	Description	Note	
Control Identifier	1A	1	M	Must always equal P.		
Record Type	2N	2-3	M	Must always equal 20.		
Filer Type	1A	4	M	A code identifying the filer type. Valid codes are:  1 = Initial Filer 2 = Amending Filer		
Filer Indicator	1A	5	M	A code indicating that A is used as an Electronic (ABI) filer indicator.		
Filer Identification Number	13X	6-18	M	The number identifying the initial filer or amending party.		
Protest Filer Name	32X	19-50	M	The name associated with the filer ID number.		
Filler	30X	51-80	M	Space fill.		

## Record Identifier P21 (SS) (Output)

This is a protest filer address output record. As part of the SS inquiry/notification transaction it is used to transmit address data for initial filer and amending filers. It is required when Record Identifier P20 is transmitted.

Record Identifier P21 (SS) (Output)					
Data Element	Length/ Class	Position	Status	Description	Note
Control Identifier	1A	1	M	Must always equal P.	
Record Type	2N	2-3	M	Must always equal 21.	
Protest Filer Mailing Address Line #1	32X	4-35	М	The street address of the initial or amending filer. A street address can contain up to 64 positions. The first 32 positions are reported here, the next 32 are reported in Record Identifier P22.	
Protest Filer City, Mailing Address	21X	36-56	M	The name of the city, spelled out in its entirety.	
Protest Filer State, Mailing Address	2A	57-58	С	The abbreviation for the state established by the U.S. Postal Service. Required for U.S. states and provinces of Canada. Not applicable for Mexican states.	
Protest Filer ZIP or Postal Code	9X	59-67	С	For an U.S. address, a 5-9 position numeric ZIP Code established by the U.S. Postal Service. For a Canadian address, type a Canadian postal routing code in the format ANANAN. Not applicable for Mexican addresses.	
Protest Filer Country	2A	68-69	С	The ISO code for the country. Valid codes are:  US = United States CA = Canada MX = Mexico	
Filler	11X	70-80	M	Space fill.	

## Record Identifier P22 (SS) (Output)

This is a protest filer address continuation output record. As part of the SS inquiry/notification transaction it is transmitted with Record Identifier's P20 and P21 only if the filer address requires two lines. This record is transmitted only when a full file inquiry is requested and then only when line to address data exists.

Record Identifier P22 (SS) (Output)					
Data Element	Length/ Class	Position	Status	Description	Note
Control Identifier	1A	1	M	Must always equal P.	
Record Type	2N	2-3	M	Must always equal 22.	
Protest Filer Mailing Address Line #2	32X	4-35	M	The street address of the filer. A street address can contain up to 64 positions. The first 32 positions are reported in Record Identifier P21, the second 32 are reported here.	
Filler	45X	36-80	M	Space fill.	

# Record Identifier P30 (SS) (Output)

This is a protest protestant identification output record. It is used as part of the SS inquiry/notification transaction to transmit data identifying the protestant. This record is transmitted only when a full file inquiry is requested.

Record Identifier P30 (SS) (Output)					
Data Element	Length/ Class	Position	Status	Description	Note
Control Identifier	1A	1	M	Must always equal P.	
Record Type	2N	2-3	M	Must always equal 30.	
Surety Certification	1A	4	С	A code of <i>X</i> indicating electronic signature of the surety. This 514 protest is not filed in order to extend another authorized person's time to protest. Required with Protestant Type in position 5 is "S" (Surety).	
Protestant Type	1A	5	M	A code identifying the protestant type. Valid codes are:  D = Drawback Claimant F = Foreign Manufacturer/ Producer I = Importer/Consignee M = Ship's Master O = Other S = Surety V = Vessel Operator	1
Protestant Identification Number	13X	6-18	M	A three- to thirteen-digit code identifying the protestant. The format of the protestant identification number depends on the type of protestant indicated in position 5 of this record.	2
Protestant Name	32X	19-50	С	The name of the person or company filing or on whose behalf the protest is filed. Required when the Protestant Type in position 5 is "F" or "O".	
Filler	30X	51-80	M	Space fill.	

## Note 1

Valid formats for the Protestant Identification Number are:

Code	Description
NNN	Customs assigned surety code.
NN-NNNNNNXX	Employer Identification Number (EIN) or Internal Revenue Service
	Number
NNN-NN-NNNN	Social Security Number
YYDDPP-NNNNN	Customs assigned number (new format only)
AAANNNNN	Canadian Employer Number
AAANNNNN	Canadian Importer/ Exporter Number
AAAAYYMMDDXXX	Mexican Federal Tax Registry Number (Individual)
AAAYYMMDDXXX	Mexican Federal Tax Registry Number (Corporate)

Valid Protestant Identification Number and Protestant Type Combination are:

ID Number	Type
Employer Identification Number (EIN)	D, I, M, O, V
Internal Revenue Service (IRS)	
Social Security	
Customs ID	
Surety Code	S
Mexican Tax Registry Number	F
Canadian Employer/Exporter Number	F

# Record Identifier P31 (SS) (Output)

This is a protestant address output record. As part of the SS inquiry/notification transaction it is used to transmit address information. It is required when Record Identifier P30 is transmitted.

Record Identifier P31 (SS) (Output)					
Data Element	Length/ Class	Position	Status	Description	Note
Control Identifier	1A	1	M	Must always equal P.	
Record Type	2N	2-3	M	Must always equal 31.	
Protestant Mailing Address Line #1	32X	4-35	M	The street address of the protestant. A street address can contain up to 64 positions. The first 32 positions are reported here, the next 32 are reported in Record Identifier P32.	
Protestant City, Mailing Address	21X	36-56	M	The name of the city, spelled out in its entirety.	
Protestant State, Mailing Address	2A	57-58	С	The abbreviation for the state established by the U.S. Postal Service. Required for U.S. states and provinces of Canada. Not applicable for Mexican states.	
Protestant ZIP or Postal Code	9X	59-67	С	For an U.S. address, a 5-9 position numeric ZIP Code established by the U.S. Postal Service. For a Canadian address, type a Canadian postal routing code in the format ANANAN. Not applicable for Mexican addresses.	
Protestant Country	2A	68-69	С	The ISO code for the country. Valid codes are:  US = United States CA = Canada MX = Mexico	
Filler	11X	70-80	M	Space fill.	

# Record Identifier P32 (SS) (Output)

This is a protestant address continuation output record. This record is transmitted as part of the SS inquiry/notification transaction only when the protestant address requires two lines.

Record Identifier P32 (SS) (Output)					
Data Element	Length/ Class	Position	Status	Description	Note
Control Identifier	1A	1	M	Must always equal P.	
Record Type	2N	2-3	M	Must always equal 32.	
Protestant Mailing Address Line #2	32X	4-35	M	The street address of the protestant. A street address can contain up to 64 positions. The first 32 positions are reported in Record Identifier P31, the second 32 are reported here.	
Filler	45X	36-80	M	Space fill.	

## Record Identifier P40 (SS) (Output)

This is a protest refund care/of (c/o) identification output record. It applies to 514 protest and 520 petitions, not to 181.115 interventions. As part of the SS inquiry/notification transaction, it is used to identify a party named in the protest to receive mailing of any refund regarding the entry under protest. It is transmitted only when a full file inquiry is requested and then only when data for these fields exists.

Record Identifier P40 (SS) (Output)					
Data Element	Length/ Class	Position	Status	Description	Note
Control Identifier	1A	1	M	Must always equal P.	
Record Type	2N	2-3	M	Must always equal 40.	
Filler	1A	4	M	Space fill.	
Refund C/O Party Type	1A	5	M	A code indicating the type of refund c/o party. Valid codes are:  B = Customs Broker D = Drawback Claimant I = Importer/Consignee M = Ship's Master S = Surety T = Attorney	
Refund C/O Party Identification Number	12X	6-18	M	V = Vessel Owner/Operator  An eleven- to twelve-digit code identifying the refund c/o party.	1
Refund C/O Party Name	32X	19-50	M	The name of the refund c/o party associated in ACS files with the identification number above.	
Filler	31X	51-80	M	Space fill.	

### Note 1

Valid formats for the Refund C/O Identification Number are:

Code	Description
NN-NNNNNNXX	Employer Identification Number (EIN) or Internal Revenue Service Number
NNN-NN-NNNN YYDDPP-NNNNN	Social Security Number Customs Assigned Number (new format only)

### Note 1 - Continued

Valid Refund C/O Identification Number and Refund C/O Type combinations are:

ID Number Type

Employer Identification Number (EIN)
Internal Revenue Service (IRS)
Social Security
Customs ID

B, D, I, M, S, T, V

# Record Identifier P41 (SS) (Output)

This is a protest refund care/of (c/o) address output record. As part of the SS inquiry/notification transaction it is used to transmit address data for any of the refund c/o party. It is required when Record Identifier P40 is transmitted.

Record Identifier F	Record Identifier P41 (SS) (Output)							
Data Element	Length/ Class	Position	Status	Description	Note			
Control Identifier	1A	1	M	Must always equal P.				
Record Type	2N	2-3	M	Must always equal 41.				
Refund C/O Party Mailing Address Line #1	32X	4-35	M	The street address of the refund c/o party. A street address can contain up to 64 positions. The first 32 positions are reported here, the next 32 are reported in Record Identifier P42.				
Refund C/O Party City, Mailing Address	21X	36-56	M	The name of the city, spelled out in its entirety.				
Refund C/O Party State, Mailing Address	2A	57-58	С	The abbreviation for the state established by the U.S. Postal Service. Required for U.S. states and provinces of Canada. Not applicable for Mexican states.				
Refund C/O Party ZIP or Postal Code	9X	59-67	С	For an U.S. address, a 5-9 position numeric ZIP Code established by the U.S. Postal Service. For a Canadian address, type a Canadian postal routing code in the format ANANAN. Not applicable for Mexican addresses.				
Refund C/O Party Country	2A	68-69	С	The ISO code for the country. Valid codes are:  US = United States CA = Canada MX = Mexico				
Filler	11X	70-80	M	Space fill.				

# Record Identifier P42 (SS) (Output)

This is a protest refund care/of (c/o) address continuation output record. As part of the SS inquiry/notification transaction it is transmitted with Record Identifier's P40 and P41 only if the refund c/o address requires two lines.

Record Identifier P42 (SS) (Output)									
Data Element	Length/ Class	Position	Status	Description	Note				
Control Identifier	1A	1	M	Must always equal P.					
Record Type	2N	2-3	M	Must always equal 42.					
Refund C/O Party Mailing Address, Line #2	32X	4-35	M	The street address of the refund c/o party. A street address can contain up to 64 positions. The first 32 positions are reported in Record Identifier P41, the second 32 are reported here.					
Filler	45X	36-80	M	Space fill.					

#### Record Identifier P50 (SS) (Output)

This is a protest substitute party identification output record. It applies only to 514 protests, 520 petitions or 181.115 interventions. It is used to identify a party designated by the protestant to receive notice in case of denial of the protest. As part of the SS inquiry/notification transaction, it is transmitted only when a full file inquiry is requested and then only when data for these fields exists.

Record Identifier	P50 (SS) (C	Output)			
Data Element	Length/ Class	Position	Status	Description	Note
Control Identifier	1A	1	M	Must always equal P.	
Record Type	2N	2-3	M	Must always equal 50.	
Filler	1A	4	M	Space fill.	
Substitute Type	1A	5	M	A code of A indicating an electronic filer (ABI).	
Substitute DDPP	4N	6-9	M	The ABI processing DDPP of the substitute party designated to receive notice of denial. Not transmitted when the type in position 5 of this record is other than "A".	
Substitute Filer Code	3X	10-12	M	The ABI filer code of substitute party designated to receive notice of denial. Not transmitted when the type in position 5 of this record is other than "A".	
Substitute Office Code	2X	13-14	О	The ABI office code of the party substitute designated to receive the notice of denial. Not transmitted when the type in position 5 of this record is other than "A".	
Substitute Name	32X	15-46	М	The name of the substitute party. Not transmitted when the type in position 5 of this record is other than "A".	
Filler	34X	47-80	M	Space fill.	

### Record Identifier P51 (SS) (Output)

This is a protest substitute party address output record. As part of the SS inquiry/ notification transaction it is used to transmit address data for the substitute party. It is required when Record Identifier P50 is transmitted, except when the substitute party is an ABI filer.

Record Identifier P51 (SS) (Output)								
Data Element	Length/ Class	Position	Status	Description	Note			
Control Identifier	1A	1	M	Must always equal P.				
Record Type	2N	2-3	M	Must always equal 51.				
Substitute Mailing Address, Line #1	32X	4-35	M	The street address of the substitute party. A street address may contain up to 64 positions. The first 32 positions are reported here, the next 32 are reported in Record Identifier P52.				
Substitute City, Mailing Address	21X	36-56	M	The name of the city, spelled out in its entirety.				
Substitute State, Mailing Address	2A	57-58	С	The abbreviation for the state established by the U.S. Postal Service. Required for U.S. states and provinces of Canada. Not applicable for Mexican states.				
Substitute ZIP or Postal Code	9X	59-67	С	For an U.S. address, a 5-9 position numeric ZIP Code established by the U.S. Postal Service. For a Canadian address, type a Canadian postal routing code in the format ANANAN. Not applicable for Mexican addresses.				
Substitute Country	2A	68-69	С	The ISO code for the country. Valid codes are:  US = United States CA = Canada MX = Mexico				
Filler	11X	70-80	С	Space fill.				

# Record Identifier P52 (SS) (Output)

This is a protest substitute party address continuation output record. As part of the SS inquiry/notification transaction it is transmitted with Record Identifier's P50 and P51 only if the substitute address requires two lines.

Record Identifier P52 (SS) (Output)								
Data Element	Length/ Class	Position	Status	Description	Note			
Control Identifier	1A	1	M	Must always equal P.				
Record Type	2N	2-3	M	Must always equal 52.				
Substitute Party Mailing Address, Line #2	32X	4-35	M	The street address of the substitute party. A street address can contain up to 64 positions. The first 32 positions are reported in Record Identifier P51, the second 32 are reported here.				
Filler	45X	36-80	M	Space fill.				

#### Record Identifier P60 (SS) (Output)

This is a protest entry trailer output record. As part of the SS inquiry/notification transaction it is used to transmit the number of any entry associated with the 520 petition, 514 protest or intervention. It is transmitted only when a full file inquiry has been requested and then only when data for these fields exists. This record may be repeated up to 9,999 times.

Record Identifier P60 (SS) (Output)							
Data Element	Length/ Class	Position	Status	Description	Note		
Control Identifier	1A	1	M	Must always equal P.			
Record Type	2N	2-3	M	Must always equal 60.			
Sequence Number	4N	4-7	M	The sequence number 0001 to 9999, in ascending order. The entry list is returned by Customs in alphanumeric order of the entry number. This may not be the same as the order transmitted by the filer unless the filer's software also lists the entries in alphanumeric order.			
Entry Status Indicator	1A	8	M	The current protest status of the entry. Valid codes are:  A = Approved D = Denied N = Not Protestable O = Open P = Partly Denied S = Suspended U = Untimely Denied W = Withdrawn Interventions do not get "decided" by Customs.			
Entry Number	15X	9-23	M	The entry number associated with this claim, protest or intervention. In the case of an intervention, the entry number(s) will be the same as those listed on the 514 NAFTA protest for which the intervention was filed.  Date in CCYYMMDD format on which the			
Entry Status Date	8N	24-31	M	protest status (decision) was assigned to the entry.			
Filler	49X	32-80	M	Space fill.			

#### Record Identifier P70 (SS) (Output)

This is a protest issue narrative output record. As part of the SS inquiry/notification transaction this record is used to transmit the description of the protested decision/issue. The statement of the issue is confined to a single Record Identifier P70. This record is transmitted only when a full file inquiry is requested.

Record Identifier P70 (SS) (Output)								
Data Element	Length/ Class	Position	Status	Description	Note			
Control Identifier	1A	1	M	Must always equal P.				
Record Type	2N	2-3	M	Must always equal 70.				
Protested Decision/ Issue	72X	4-75	M	Narrative concisely describing protested decision of the Trade Compliance Process Owner, or matter subject to protest as set forth in CFR 174.11 and CFR 181.115.				
Filler	5X	76-80	M	Space fill.				

#### Record Identifier P71 (SS) (Output)

This is a protest merchandise description output record. As part of the SS inquiry/ notification transaction it is used to transmit the commercial description of the merchandise affected by the decision as to which protest is made. The merchandise description is confined to a single Record Identifier P71. This record is transmitted only when a full file inquiry is requested. It is required when Record Identifier P90 is transmitted.

Record Identifier P71 (SS) (Output)								
Data Element	Length/ Class	Position	Status	Description	Note			
Control Identifier	1A	1	M	Must always equal P.				
Record Type	2N	2-3	M	Must always equal 71.				
Merchandise Description	72X	4-75	M	Merchandise description as required by CFR 174.13 and CFR 181.115. This is also required for 520 petitions.				
Filler	5X	76-80	M	Space fill.				

### Record Identifier P80 (SS) (Output)

This is a conditional protest output record. It is transmitted as part of the SS output only when a full file inquiry request has been received. Its purpose is to segregate the narrative into types (initial, amendment, additional arguments), report the date and time the narrative was received by Customs, and identify the party who submitted the narrative. Record Identifier P80 precedes the Record Identifier P90(s) with which it is associated.

Record Identifier P80 (SS) (Output)								
Data Element	Length/ Class	Position	Status	Description	Note			
Control Identifier	1A	1	M	Must always equal P.				
Record Type	2N	2-3	M	Must always equal 80.				
Action Code	1N	4	M	A code identifying action. Valid codes are:  1 = Initial Justification/Arguments 2 = Amended Justification/ Arguments 3 = Additional Justification/ Arguments				
Date	8N	5-12	M	The date in CCYYMMDD format of action filed with Customs via ABI.				
Time	8N	13-20	M	The time in HHMMSSNN format of action filed with Customs via ABI.				
Filer Type	1A	21	M	Code of <i>A</i> identifying the type of ABI filer making the filing.				
Filer ID	13X	22-34	M	When the full file query is being sent to the initial filer, this number identifies the party amending the protest by the action cited in position 4 of this record. When the full file query is being sent to the amending filer, this number identifies the initial filer and any other amending filer.				
Filler	46X	35-80	M	Space fill.				

### Record Identifier P90 (SS) (Output)

This is a protest narrative output record that is part of the SS inquiry/notification transaction. It is used to transmit narrative statements explaining the nature and justification for the objection, the grounds, and any other statements associated with the 520 petition, 514 protest or 181.115 intervention. This record will be transmitted a minimum of one time to a maximum of 9,999 times for each Record Identifier P80.

Record Identifier P90 (SS) (Output)							
Data Element	Length/ Class	Position	Status	Description	Note		
Control Identifier	1A	1	M	Must always equal P.			
Record Type	2N	2-3	M	Must always equal 90.			
Sequence Number	4N	4-7	M	The sequence number 0001 to 9999, in ascending order that represents the numerical order. Should match the order in which Record Identifier P90 is transmitted.			
Justification/ Arguments/ Narrative	72X	8-79	M	The justification/arguments explaining the nature and justification for the objection set forth distinctly and specifically with respect to a category, payment, petition, decision, or refusal as required by CFR 174.13. When further review is requested, this is justified under the criteria of CFR 174.25. When the action filed is a 181.115 intervention, this is a detailed statement as required by CFR 181.115(c)(5), (6), (7), (9), and (10).			
Filler	1X	80	M	Space fill.			

#### **Record Identifier P01 (Output)**

This is a mandatory protest error-free acknowledgment output record. It may be returned for any protest transaction: PJ initial filing, QJ amendment, RJ addendum, or SJ service request. Record Identifier P01 record will be used when no errors or warnings have been detected or generated. For initial filings, Record Identifier P01 will contain the Customs-assigned protest number. No other records are transmitted when a protest filing is accepted error free.

Record Identifier P01 (Output)								
Data Element	Length/ Class	Position	Status	Description	Note			
Control Identifier	1A	1	M	Must always equal P.				
Record Type	2N	2-3	M	Must always equal 01.				
Protest Number	12N	4-15	M	The number assigned by Customs to the 514 protest, 510(c) or (d) petition or 181.115 intervention filed via ABI.				
Filer Reference Number	12X	16-27	M	The unique number assigned by filer to the 520 petition, 514 protest or 181.115 intervention.				
Response Code	3A	28-30	M	Space fill.				
Response Message	40X	31-70	М	The response message is "Protest filing accepted error-free".				
Filler	10X	71-80	M	Space fill.				

#### **Record Identifier P99 (Output)**

This is a conditional protest warning/reject response output message record. It may be returned for any protest transaction: PJ initial filing, QJ amendment, RJ addendum or SJ service request. Record Identifier P99 is transmitted as the final record when a protest filing is accepted with warnings or rejected with errors. For initial filings that are accepted with warnings, Record Identifier P99 will contain the Customs-assigned protest number.

Record Identifier F	Record Identifier P99 (Output)							
Data Element	Length/ Class	Position	Status	Description	Note			
Control Identifier	1A	1	M	Must always equal P.				
Record Type	2N	2-3	M	Must always equal 99.				
Protest Number	12N	4-15	М	The number assigned by Customs to the 514 protest, 520(c) or (d) petition or 181.115 intervention filed via ABI.				
Filer Reference Number	12X	16-27	M	The unique number assigned by filer to the 520 petition, 514 protest or 181.115 intervention.				
Response Code	3A	28-30	M	A response code indicating warning or rejection. Valid codes are:  WRN = Warning(s) or REJ = Rejected				
Response Message	40X	31-70	М	One of the following response messages:  "Protest filing accepted with warnings." or "Protest filing rejected with errors."				
Filler	10X	71-80	M	Space fill.				

#### **Record Identifier PER (Output)**

This is a conditional protest error response output message record. It may be returned for any protest transaction: PJ initial filing, QJ amendment, RJ addendum, or SJ service request. This record is used to transmit the error or warning message text. One Record Identifier PER is transmitted for each error or warning condition that is detected in any protest transaction. One Record Identifier PER or a block of Record Identifier PERs will be preceded by the record or block of records containing the error/warning, beginning with Record Identifier P10. Record Identifier P10, and the record or block of records with the error, will not be repeated. Each error or warning message begins with a three-position identifier code. When all the error/warning messages have been cited, a final Record Identifier P99 indicating the protest has been either accepted with warnings or has been rejected will be system generated. If an error is detected, no further processing will occur on that protest. If a warning is invoked, the processing of the protest will continue and Record Identifier P99 will contain the Customs-assigned protest number.

Record Identifier PER (Output)					
Data Element	Length/ Class	Position	Status	Description	Note
Control Identifier	1A	1	M	Must always equal P.	
Record Type	2A	2-3	M	Must always equal ER.	
Error Code	3A	4-6	M	A code identifying the error or warning message. This is provided to enable users to sort and otherwise electronically process error and warning records. These codes are listed in Appendix M.	
Error Message	33X	7-39	M	A narrative message explaining the error or warning.	
Filler	41X	40-80	M	Space fill.	